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July 21, 2005

Mr. Paul Dabbs
Statewide Planning Branch
California Department of Water Resources
P.O. Box 942836
Sacramento, California 94236-0001

Dear Mr. Dabbs:

Subject: Comments on the Draft 2005 California Water Plan

The City of Los Angeles Department of Water and Power (LADWP) commends the staff of the California Department of Water Resources for its diligent efforts in developing and completing the draft California Water Plan for 2005 and providing the public with an extensive review and comment process. The amount of collaboration and statewide input your agency was able to facilitate over the past several years is outstanding.

The Water Plan thoroughly addresses a comprehensive inventory of statewide water issues and identifies a robust list of potential tools for "wringing every bit of utility" from California's available water supplies. The LADWP is in agreement with the principles and recommendations of the Water Plan. However, LADWP would like to comment specifically on three critical water issues: Urban Water Use Efficiency, Water Transfers, and Water Reclamation. In addition, LADWP proposes a small number of technical changes to the text of the Water Plan.

Urban Water Use Efficiency

The City of Los Angeles is a leader in the installation of hardware measures to conserve water in California. These measures are an important tool in permanently reducing water use, and in planning future water demands. LADWP requests a more detailed discussion of the effects of "demand hardening," or when options available for reducing water use are narrowed as the customer base is saturated with hardware conversions and efficient water usage patterns prevail. Demand hardening is an important consideration in responding to future supply scarcities and should receive greater attention in the California Water Plan.

Water and Power Conservation ... a way of life

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Water Transfers

LADWP appreciates the efforts made to address the critical issue of water transfers in Volume 2, Chapter 23 of the Water Plan. While LADWP understands the regulatory demands on the DWR, a sustained, active role by DWR at the beginning and throughout the water transfer process would serve to enhance the overall water transfer process for all contract parties involved.

According to California Water Code Section 480, "the Department [DWR] shall establish an ongoing program to facilitate the voluntary exchange or transfer of water." Establishing a streamlined water transfer authorization process would enhance the water transfer marketplace and allow DWR to more effectively meet the needs of water agencies transferring and receiving water. As water transfers play a more vital role in water supply for California, DWR should consider making itself a more visible part of the entire transfer process and fulfill the intentions of CWC Section 480.

Recycled Water

Recycled water is a very important component of LADWP's strategy to develop a diversified water supply portfolio consistent with the State's water recycling goals, but considerable difficulties have been encountered during project implementation. These difficulties are shared by many other recycled water purveyors throughout the state, and are addressed by the Recycled Water Task Force recommendations. LADWP supports the detailed description of the Task Force recommendations included in the Plan, but strongly believes that an aggressive strategy for implementation of these recommendations should be incorporated into the Plan, including those requiring legislative action. Substantial progress toward implementation of these recommendations will be required to facilitate developing the 0.9 to 1.4 million Acre-feet per year of recycled water potential identified by the Plan.

Under the "Recommendations to Increase Recycled water Usage" heading, development of uniform state standards and interpretation is listed as the fifth of five recommendations. LADWP believes that this recommendation should be identified as the most important step, as the ability to obtain regulatory approval is a fundamental component of project implementation. Presently, issuance of differing and often inconsistent requirements for water recycling projects has significantly impeded implementation of even typical projects such as those designed to deliver recycled water for irrigation use. Without a uniform regulatory framework, there are no assurances that a water recycling project can be placed into service, even if funding and other issues are resolved. Uniform regulations and interpretation would ensure that

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such routine projects are assessed not just on local conditions, but also in the context of statewide water supply and environmental benefits.

Technical Changes

In reviewing the California Water Plan, LADWP has located statements requiring clarification or modification. These include the following:

Volume 3, Chapter 5, Page 5-7: Delete the phrase "...and exchanges with MWD" in the third full paragraph. While the City of Los Angeles does manage arsenic concentrations through water treatment, exchanges with MWD are not typically part of this process.

Volume 3, Chapter 5, Page 5-11 and Volume 4, California Water Quality in 2004, Page 27 : Change the phrase "...and the Upper Los Angeles River Basin Watermaster" to "...and the cities of Burbank and Glendale" in the third full paragraph and last paragraph, respectively. These cities also operate cleanup facilities in the San Fernando Basin. The ULARA Watermaster does not own or operate any water facilities.

Volume 3, Chapter 9, Page 9-7: Change the word "export" in the final sentence of the third paragraph to "diversion."

Volume 3, Chapter 10, Page 10-4: Modify the second sentence in the first paragraph to read "...1913, and the restoration of Owens Lake."

Volume 3, Chapter 10, Page 10-4: Delete the phrase "...resulting in fish kills downstream" in the fifth full paragraph, and change the sentence to end with "...levels in the reservoir." There have been no recorded fish kills in the Owens Gorge or Pleasant Valley Reservoir due to dissolved oxygen levels.

Volume 3, Chapter 10, Page 10-5: Change the second paragraph to reflect significant improvements at Owens Lake: "In the Owens Valley, a restoration project is in operation to mitigate for dust generated as a result of the City of Los Angeles diverting water from the Owens Lake into its aqueduct. The barren playa on Owens Lake at one time regularly exceeded federal standards for airborne particulate pollution due to the prevailing winds moving across the dry lakebed. After years of litigation, the Los Angeles Department of Water and Power is using water from the aqueduct to irrigate large tracts of lakebed to reduce the dust hazard in the area. To date, significant reductions in airborne pollution have dramatically improved conditions at Owens Lake. The full implementation of the mitigation measures will occur by January 2007."

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Volume 4, California Water Quality in 2004, Page 24: Delete the phrase "resulting in fish kills downstream" in the third full paragraph, and change the sentence to end with "levels in the reservoir." There have been no recorded fish kills in the Owens Gorge or Pleasant Valley Reservoir due to dissolved oxygen levels.

Congratulations again on your diligent research and work on the California Water Plan. We look forward to working with the state and our regional and local partners in carrying out the goals of the plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas M. Erb". The signature is fluid and cursive, with the first name "Thomas" and last name "Erb" clearly distinguishable.

Thomas M. Erb
Director of Water Resources

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